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June 14, 2022

VIA ECF

The Honorable Valerie Figueredo
United States Magistrate Judge
United States District Court
Southern District of New York
500 Pearl Street, Courtroom 17A
New York, New York 10151

Re: Athena Art Finance Corp. v. Certain Artwork by Jean-Michel Basquiat entitled Humidity, 1982, In Rem, No. 20 Civ. 4669

Dear Judge Figueredo:

We write on behalf of Athena Art Finance Corporation (“Athena”) regarding Satfinance Investment Ltd.’s (“SIL”) letter motion filed today, June 14, 2022 (Dkt. 126) (the “June 14 Letter”).¹ The June 14 Letter seeks multiple categories of new relief not sought in SIL’s May 25, 2022 letter (Dkt. 110) (the “May 25 Letter”), and attempts to shoehorn those requests into the conference presently scheduled before the Court on June 16, 2022 (the “June 16 Conference”).

Athena intends to submit a response opposing the June 14 Letter on or before June 17, 2022, as permitted under Section II(c)(3) of the Court’s Individual Practices in Civil Cases. However, Athena respectfully submits that it would be both prejudicial and inconsistent with the Court’s rules for the issues raised in the June 14 Letter to be considered at the June 16 Conference, before being fully briefed. For these reasons, and for the reasons set forth in Athena’s June 13, 2022 letter in opposition to the May 25 Letter (Dkt. 125), Athena respectfully requests that the Court adjourn the June 16, 2022 conference until the Court has received and reviewed Athena’s response.

Moreover, the June 14 Letter is premature; the parties have not met and conferred regarding the relief sought in the June 14 Letter, nor have the parties determined that there are areas of impasse for the Court to consider and rule upon. *See* Individual Practices in Civil Cases, Section II(c) (requiring that parties meet and confer prior to motion filing and detail the results of such meetings). Indeed, certain of the issues raised in the June 14 Letter were never raised to Athena before the June 14 Letter was filed. To

¹ Delahunty Limited joined the June 14 Letter by letter today. (Dkt. 127).



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be efficient with the Court's time, Athena will seek to meet and confer with SIL about its applications in the June 14 Letter, and address the result of any meeting in its response.

Thank you for your attention to and consideration of these issues.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'James D. Gatta', with a stylized flourish at the end.

James D. Gatta

Counsel for Athena Art Finance Corp.

cc: Counsel of Record (via ECF)